



from reporting criminal activities to law enforcement authorities and otherwise;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT TWO

**Conspiracy to Commit Kidnapping**

The Grand Jury Further Charges:

On or about August 12, 2012, in the District of North Dakota,

JEFFREY JIM BUTLER, a/k/a “Pops”;  
NICHOLAS JAMES GORDON WOODFORD;  
ZACHARY RUSSELL MILLS;  
TYLER MICHAEL WHITE, a/k/a TYLER BUTLER; and  
JAMES DEAN ODENEAL,

did knowingly and intentionally combine, conspire, confederate, and agree together with others, both known and unknown to the grand jury, to violate Title 18, United States Code, Section 1201(a)(1), by kidnapping, abducting, seizing, confining, carrying away, and willfully transporting Robert Osterhout in interstate commerce from the State of North Dakota to the State of Montana, and holding Robert Osterhout for the purpose of assaulting and killing him, preventing Robert Osterhout from reporting criminal activities to law enforcement authorities and otherwise.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. JEFFREY JIM BUTLER, a/k/a “Pops,” instructed NICHOLAS JAMES GORDON WOODFORD; ZACHARY RUSSELL MILLS; TYLER MICHAEL WHITE, a/k/a TYLER BUTLER; and JAMES DEAN ODENEAL, to lure Robert Osterhout to a residence in Williston, North Dakota, for purposes of assaulting Robert Osterhout;

2. NICHOLAS JAMES GORDON WOODFORD and ZACHARY RUSSELL MILLS, and others, assaulted Robert Osterhout with metal knuckles, tazers, fists, feet, and other objects, inside a camper at a residence in Williston, North Dakota;

3. TYLER MICHAEL WHITE, a/k/a TYLER BUTLER, and JAMES DEAN ODENEAL retrieved plastic material and used the same to line the trunk of an automobile that Robert Osterhout was transported in;

4. NICHOLAS JAMES GORDON WOODFORD and ZACHARY RUSSELL MILLS, and others, bound Robert Osterhout's hands, feet, and mouth, and placed Robert Osterhout in the trunk of an automobile for purposes of transporting him to another location;

5. JEFFREY JIM BUTLER, a/k/a "Pops," drove an automobile in which Robert Osterhout was confined in the trunk and in which NICHOLAS JAMES GORDON WOODFORD; ZACHARY RUSSELL MILLS; and TYLER MICHAEL WHITE, a/k/a TYLER BUTLER, were passengers, to a location in the State of Montana; and

6. JEFFREY JIM BUTLER, a/k/a "Pops"; NICHOLAS JAMES GORDON WOODFORD; ZACHARY RUSSELL MILLS, and others, assaulted Robert Osterhout in the State of Montana by hitting, kicking, choking, and stomping on Robert Osterhout's head and body;

In violation of Title 18, United States Code, Section 1201(c).

COUNT THREE

**Conspiracy to Distribute and Possess with intent to Distribute Methamphetamine**

The Grand Jury Further Charges:

Beginning in or about January 2012 and continuing until in or about August 2012,  
in the District of North Dakota, and elsewhere,

JEFFREY JIM BUTLER, a/k/a “Pops”;  
NICHOLAS JAMES GORDON WOODFORD;  
ZACHARY RUSSELL MILLS;  
TYLER MICHAEL WHITE, a/k/a, TYLER BUTLER; and  
JAMES DEAN ODENEAL,

did knowingly and intentionally combine, conspire, confederate, and agree together and  
with others, both known and unknown to the grand jury, to possess with intent to  
distribute and distribute a mixture and substance containing a detectable amount of  
methamphetamine, a Schedule II controlled substance, in violation of Title 21, United  
States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one  
or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did  
possess with intent to distribute and did distribute methamphetamine, a Schedule II  
controlled substance, within the State of North Dakota, and elsewhere;

2. It was further a part of said conspiracy that the defendants and others would  
and did attempt to conceal their activities utilizing a system of surveillance at a  
residential location in Williston, North Dakota;

3. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to engage in drug distribution;

4. It was a further part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

5. It was a further part of said conspiracy that the defendants and others would and did use firearms in their drug transactions for protection and intimidation, and otherwise;

6. It was a further part of said conspiracy that the defendants and others would and did threaten, intimidate, and assault distributors and recipients of the drugs to prevent reporting and disclosure of their criminal activities to authorities, and otherwise; and

7. It was further part of said conspiracy that JEFFREY JIM BUTLER, a/k/a "Pops," recruited others to be part of an organization named "the Family" to further the distribution of methamphetamine. In so doing, JEFFREY JIM BUTLER, a/k/a "Pops," provided and offered to provide food, shelter, and spending money to persons he recruited for the organization. Members of the organization were given identified roles to assist in the distribution of methamphetamine. Members of the

organization were threatened and assaulted to maintain compliance with the rules of the organization;

In violation of Title 21, United States Code, Section 846.

A TRUE BILL:

/s/ Grand Jury Foreperson  
Foreperson

/s/ Timothy Q. Purdon  
TIMOTHY Q. PURDON  
United States Attorney

RLV/DDH:rab